

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
(WESTERN DIVISION)**

Henry Jel Brook

In re:) Chapter 11
WESTERN MASSACHUSETTS)
LIFECARE CORPORATION,) Case No. 09-30737 (HJB)
d/b/a Reeds Landing)
Debtor.)

**MOTION TO APPROVE DEBTOR'S MOTION FOR
AN ORDER APPROVING THE SALE OF CERTAIN REAL PROPERTY
OF INCONSEQUENTIAL VALUE TO SPRINGFIELD COLLEGE FREE
AND CLEAR OF ALL LIENS, CLAIMS, INTERESTS AND ENCUMBRANCES
WITHOUT A HEARING OR, ALTERNATIVELY, FOR AN EXPEDITED HEARING**

Pursuant to MLBR 9013-1(e) and (g), Western Massachusetts Lifecare Corporation, the debtor and debtor in possession in the above-captioned case (the "Debtor"), hereby moves this Court to approve immediately without a hearing or, in the alternative, to schedule an expedited hearing **no later than Friday, August 14, 2009**, to consider the Debtor's *Motion for an Order Approving the Sale of Certain Real Property of Inconsequential Value to Springfield College Free and Clear of All Liens, Claims, Interests and Encumbrances Without a Hearing or, Alternatively, for an Expedited Hearing* (the "Sale Motion"),¹ filed simultaneously herewith and incorporated in its entirety herein.

In support of this motion, the Debtor respectfully represents as follows:

1. The following parties have been advised of the Sale Motion and have assented to the relief requested therein: Official Committee of Unsecured Creditors, Baystate Health, Inc.,

¹ Capitalized terms not otherwise defined herein shall have the meanings given to them in the Sale Motion.